

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**EDEKKA LLC,**

Plaintiff,

v.

**MASON COMPANIES, INC.,**

Defendant.

Case No. 2:14-cv-456

**PATENT CASE**

**JURY TRIAL DEMANDED**

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**DECLARATION OF SANJAY PANT**

I, Sanjay Pant, hereby state and declare as follows:

1. My name is Sanjay Pant. I submit this Declaration in support of Plaintiff eDekka LLC's Response to Defendant Mason Companies' Motion to Dismiss or Transfer in the above-captioned case.

2. I am over 18 years of age, and I am fully competent to make this sworn declaration. I have personal knowledge of the facts stated in this declaration, and they are all true and correct.

3. I am one of the three co-founders and Managing Members of eDekka LLC ("eDekka"), the plaintiff in this lawsuit.

4. I have a B.S. degree in electrical engineering from the University of Maryland at College Park, and a J.D. degree from the University of California at Los Angeles. I have been a member in good standing of the State Bar of Texas since November 2007, and I am also admitted to practice before the United States Patent and Trademark Office.

5. eDekka is a Texas limited liability company, formed on September 19, 2013, with its principal place of business at 3400 Silverstone Drive, Suite 191-A, Plano, Texas 75023. eDekka's principal place of business is located in Collin County, Texas, in the Eastern District of

Texas.

6. eDekka is in the business of patent licensing. eDekka is the owner by assignment of U.S. Patent No. 6,266,674 (the "'674 Patent"). Since its formation in September 2013, eDekka has been actively engaged in efforts to license, covenant, enforce, or otherwise grant rights to the '674 Patent.

7. I live in McKinney, in the Eastern District of Texas, with my wife and two daughters. I have lived in the Eastern District of Texas for more than six years, since September 2008. Before that, from the time I completed my formal legal education in May 2007 until September 2008, I lived near the Eastern District of Texas, in Dallas. In addition, I have worked in the Eastern District of Texas since August 2007, when I started my first job after completing my formal legal education. I lived and worked in the Eastern District of Texas long before eDekka was formed and long before this lawsuit was brought.

8. A primary reason for the location of eDekka's principal place of business being in Plano, in the Eastern District of Texas, is that this location is near my residence. There is nothing sinister, manipulative, or otherwise illegitimate about eDekka's business or its location in the Eastern District of Texas.

9. eDekka has two other co-founders and managing members, Lillian Woung and Gautham Bodepudi. Ms. Woung currently lives in Houston, in the Southern District of Texas. Mr. Bodepudi currently lives in Austin, in the Western District of Texas, and prior to that, he lived in Dallas, in the Northern District of Texas. Accordingly, all three of eDekka's managing members live in Texas, in the Eastern District or in an adjacent District.

10. I expect to be a witness at the trial of this case. It would be far more convenient for me to appear as a witness in the Eastern District of Texas, my home district, rather than in the

Western District of Wisconsin.

11. There is also a reasonable probability that Mr. Bodepudi and Ms. Woung would be witnesses at the trial of this case. For all three of them, it would be far more convenient to appear as a witness in the Eastern District of Texas than in the Western District of Wisconsin.

12. eDekka maintains all of its physical documents in the Eastern District of Texas, including eDekka's corporate records and documents relating to its formation, documents relating to the '674 Patent, and other documents.

13. eDekka maintains its primary repositories of electronic documents in the Eastern District of Texas. Mr. Bodepudi and Ms. Woung also have electronic documents related to eDekka in adjacent districts, but the electronic documents in their possession would be duplicative of those in eDekka's primary repositories of electronic documents in the Eastern District of Texas. eDekka's outside counsel, Tadlock Law Firm PLLC, also has certain electronic documents related to eDekka. Those documents are at Tadlock Law Firm's office in Plano, in the Eastern District of Texas.

14. eDekka's business bank account is with a bank in Allen, Texas, in the Eastern District of Texas, near eDekka's principal place of business.

15. eDekka is properly registered with the Comptroller's Office of the State of Texas, in compliance with its franchise tax responsibilities. Its State Tax ID number is 32052007708. eDekka has not had to pay franchise taxes in Texas to date, but it is in compliance with all reporting responsibilities in Texas.

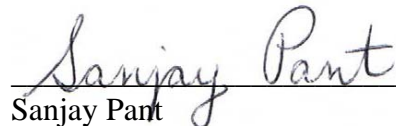
16. eDekka has never filed any lawsuit or conducted any business in the Western District of Wisconsin. It would be inconvenient for eDekka to litigate in the Western District of Wisconsin. As set forth in more detail above, no eDekka party witness is located in the Western

District of Wisconsin, and eDekka's party witnesses would have to travel to the Western District of Wisconsin if the case were transferred there. In addition, eDekka's documents are not in the Western District of Wisconsin and would have to be transported there if the case were transferred. All of these things would subject eDekka to additional cost and inconvenience if this case were transferred to the Western District of Wisconsin.

17. In summary, eDekka is a *bona fide* Texas company and citizen of the State of Texas, and its documents relevant to this suit are located in the Eastern District of Texas. The Eastern District of Texas is more convenient for eDekka to litigate this case than the Western District of Wisconsin.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 1, 2014.

  
Sanjay Pant